

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re	:
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Lehman Brothers Holdings Inc., <i>et al.</i>	:
	:
Debtors.	:
	:
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Chapter 11  
Case No. 08-13555 (JMP)  
Jointly Administered

**SUPPLEMENTAL DECLARATION OF KYLE REDFEARN IN SUPPORT  
OF THE SUPPLEMENTAL APPLICATION TO EXPAND THE  
RETENTION OF CB RICHARD ELLIS INC.  
AS REAL ESTATE CONSULTANT FOR THE DEBTORS**

I, Kyle Redfearn, make this Declaration under 28 U.S.C. § 1746 and state:

1. I am a Managing Director of the Financial & Tax Reporting Services of CB Richard Ellis, Inc. (“CBRE”), a professional real estate services firm. I submit this supplemental declaration on behalf of CBRE in support of the *Supplemental Application of the Debtors Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code and Rule 2014 of the Federal Rules of Bankruptcy Procedure for Authorization to Expand the Scope of Retention of CB Richard Ellis, Inc. as a Real Estate Consultant, Effective as of June 8, 2011*, filed on July 12, 2011 (the “Supplemental Application”) [ECF No. 18447].<sup>1</sup>

2. Attached hereto to this supplemental declaration are the schedules referenced in the *Declaration of Kyle Redfearn in Support of the Supplemental Application to Expand the Retention of CB Richard Ellis Inc. as Real Estate Consultant for the Debtors*, annexed as Exhibit A of the Supplemental Application (the “Redfearn Declaration”).

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Supplemental Application.

3. Except as set forth in the Redfearn Declaration or disclosed on Schedule B, Schedule B-1, Schedule B-2, Schedule C and Schedule D described in the Redfearn Declaration and attached hereto, and based upon the information available to me, neither I, nor CBRE, insofar as I have been able to ascertain, holds or represents any interest adverse to LCPI or its estate in the matters upon which CBRE is to be employed. Based upon the information available to me, I believe that CBRE is a “disinterested person” as that term is defined in section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the Bankruptcy Code and as required by section 327(a) of the Bankruptcy Code in that, except as set forth in this Declaration: (a) CBRE has no connection with LCPI, its affiliates and related entities, including certain affiliates that are debtors before this Court, its creditors, the U.S. Trustee, any person employed in the office of the U.S. Trustee or any other party with an actual or potential interest in these chapter 11 cases or their respective attorneys or accountants, (b) CBRE is not a creditor, equity security holder or insider of LCPI, (c) CBRE is not and was not, since January 1, 2007, a director, officer or employee of the Debtors and (d) CBRE does not have an interest materially adverse to the Debtors, its respective estate or any class of creditors or equity security holders by reason of any direct or indirect relationship to, connection with or interest in the Debtors, or for any other reason.

4. This declaration is provided in accordance with Bankruptcy Rule 2014.

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed on: July 19, 2011

By: /s/ Kyle Redfearn  
Kyle Redfearn